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March 8, 2020

By ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

We respectfully reply to the government's 10 p.m. letter regarding the belated production of GX 411. Dkt. No. 77. We also note that whereas the government apparently has access to documents that Commerzbank produced in response to a subpoena in some other matter, the government produced to defense exactly four documents from Commerzbank's subpoena return in this matter (including a blank envelope and a duplicate).

We attach the relevant correspondence between the parties that followed the first identification of GX 411 on Saturday March 7, 2020. We will be prepared to address the matter in Court tomorrow.

Respectfully submitted,

/s/ Brian M. Heberlig
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cc: Counsel of Record (via ECF)